

Fact Sheet



For Final Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this minor modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on June 29, 2005.

Permit Number: **R30-07900006-2005**

Application Received: **October 31, 2008**

Plant Identification Number: **079-00006**

Permittee: **Appalachian Power Company (d.b.a. American Electric Power)**

Facility Name: **John E. Amos Plant**

Mailing Address: **1 Riverside Plaza, Columbus, OH 43215-2373**

Permit Action Number: MM01

Revised: May 27, 2009

Physical Location:	St. Albans, Putnam County, West Virginia
UTM Coordinates:	428.16 km Easting • 4258.42 km Northing • Zone 17
Directions:	From Charleston, take Interstate 64 West (towards Huntington). Turn right onto Exit 44 ramp and proceed to Route 35. Turn left onto Route 35 (North). The facility is located approximately 1.5 miles on the right.

Facility Description

The Amos Plant is a fossil fuel fired electric generation facility and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of two (2) coal-fired steam generators with a rated design capacity of 7,020 mmBtu/hr each, one (1) coal-fired steam generator with a rated design capacity of 11,936 mmBtu/hr, one (1) oil-fired auxiliary boiler with a rated design capacity of 642 mmBtu/hr, one (1) oil-fired auxiliary boiler with a rated design capacity of 600 mmBtu/hr, various supporting operations such as coal handling and ash handling, and various tanks with insignificant emissions. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

This minor modification is to include R13-2663A in the Title V Permit, which is for the construction of a material handling system associated with the fly ash handling system at Unit #3. This modification also incorporates R13-2663, which is for a flue gas desulfurization project at the existing power plant.

Emissions Summary

Plant Wide Emissions Summary [Tons per Year]	
Regulated Pollutants	Potential Emissions
Carbon Monoxide (CO)	No Change
Nitrogen Oxides (NO _x)	No Change
Particulate Matter (PM ₁₀)	11.23 TPY Increase
Total Particulate Matter (TSP)	22.44 TPY Increase
Sulfur Dioxide (SO ₂)	No Change
Lead (Pb)	No Change
Volatile Organic Compounds (VOC)	No Change
<i>PM₁₀ is a component of TSP.</i>	
Hazardous Air Pollutants	Potential Emissions
Arsenic	No Change
Beryllium	No Change
Chromium	No Change
Cobalt	No Change
Lead	No Change
Manganese	No Change
Mercury	No Change
Nickel	No Change
Selenium	No Change
Hydrogen Chloride	No Change
Hydrogen Fluoride	No Change
<i>Some of the above HAPs may be counted as PM or VOCs.</i>	

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons of Nitrogen Oxides (NO_x), Carbon Monoxide (CO), Sulfur Dioxide (SO₂), Particulate Matter (PM₁₀), Volatile Organic Compounds (VOC), and Hazardous air pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, John E. Amos Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

Federal and State: 45CSR13
 45CSR30 Operating permit requirement.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2663A	March 11, 2009	
Supersedes R13-2663		
Addition Fly Ash handling system at		
Unit #3		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The changes to Title V Permit and Fact Sheet since R30-07900006-2005 (RE01) was issued are the NSR permits R13-2663 and R13-2663A.

The following updates were made to the minor modification.

1. Added Section 1.2, Active R13, R14, and R19 Permits and Table.
2. Updated the facility information and regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2.
3. R13-2663 is for the construction of a material handling system associated with a flue gas desulfurization project at the John E. Amos Power Plant.
4. R13-2663A is for the modification of the fly ash handling system at Unit #3. It should be noted that Sections 5.1.16, 5.1.19, 5.1.20, 5.2.11 become applicable when the equipment is constructed.
5. Replaced the current John Amos Power Plant 45CSR2 and 45CSR10 Monitoring and Recordkeeping Plan with their revised plan that was submitted with their Title V Minor Modification application. According to the approval letter of March 23, 2009 from DAQ's Compliance and Enforcement section, the proposed plan will become effective when the new scrubbers are placed in service.
6. Section 4.5.2 was revised to reference section II.A.4 of the "45CSR 2 and 45CSR10 Monitoring Plan" for the reporting requirement of SO₂. Since the SO₂ requirement was incorporated in Section 4.2.5, the citation was revised to include 45CSR§10-8.3.b for SO₂.
7. The conditions 4.1.9, 4.1.13, 4.1.14, 4.4.4 and 4.4.5 of R13-2663A were not added to the Title V Permit Minor Modification, since the exact conditions exist in Sections 3.1.10, 3.1.11, 3.1.12, 3.4.4 and 3.4.5 of the Title V Permit. The citation for Sections 3.1.10, 3.1.11, 3.1.12, 3.4.4 and 3.4.5 were revised to include 45CSR13, R13-2663, 4.1.9; 45CSR13, R13-2663, 4.1.13; 45CSR13, R13-2663, 4.1.14; 45CSR13, R13-2663, 4.4.4; and 45CSR13, R13-2663, 4.4.5, respectively.
8. 45CSR13, R13-2663, 4.1.13 was added to the citation in Section 3.1.11 since Section 3.1.11 of the Title V Permit and condition 4.1.13 of R13-2663A are identical.

9. Section 3.1.9 was replaced with “Reserved”. CAIR rules 45CSR39 and 45CSR40 effectively provide a budget trading program for the control and reduction of the pollutant NO_x emitted from affected sources. Historically, this pollutant has been regulated under rules 45CSR1 (NO_x Budget Trading program for non-EGUs) and 45CSR26 (NO_x Budget Trading program for EGUs). Since the CAIR rules are providing the NO_x regulation, rules 45CSR1 and 45CSR26 are no longer necessary and will be repealed effective May 1, 2009.
10. The citations in Section 3.1.13 were revised to include the citation for CO-R37-C-2008-4, plus a note referring to the compliance order. Also, the compliance order was attached as Appendix E.
11. The definition to a “rolling yearly total” was added in condition 2.1.4 of the Title V permit.
12. AEP requested that CAIR language in Sections 3.1.14 through 3.1.16 be revised to match the Title V boilerplate language for CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program, and CAIR SO₂ Trading Program.
13. AEP requested that control devices for Unit 3 in the Emission Unit Table should include FGD. FGD is for flue gas desulfurization.

Non-Applicability Determinations

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

None

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

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Response to Comments (Statement of Basis)

None